

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DIGITAL MEDIA TECHNOLOGY)
HOLDINGS, LLC,)
Plaintiff,)
v.) C.A. No. 22-1642-CJB
DISNEY MEDIA & ENTERTAINMENT)
DISTRIBUTION LLC)
Defendant.)

**STIPULATION AND [PROPOSED] ORDER STAYING
LITIGATION PENDING *INTER PARTES* REVIEW PROCEEDINGS**

WHEREAS, the Patent Trial & Appeal Board (“PTAB”) has granted the petition of the defendant, Disney Media & Entertainment Distribution LLC (“DMED”), to institute *inter partes* review of asserted U.S. Patent No. 7,574,725 (IPR2024-00736, the “IPR”);

WHEREAS, DMED expressed its intention to move to stay this litigation pending the issuance by the PTAB of the Final Written Decision in the IPR; and

WHEREAS, the plaintiff, Digital Media Technology Holdings, LLC, does not oppose a stay of this action pending the issuance of the PTAB’s Final Written Decision in the IPR;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, through their undersigned counsel and subject to the approval of the Court, that:

1. This action is stayed pending the PTAB's issuance of the Final Written Decision in the IPR.
2. The parties shall submit a joint status report with their proposals as to how this case should proceed within 14 days of the PTAB's issuance of the Final Written Decision in the IPR.
3. This stipulation and order is without prejudice to either party's right to request that the stay be lifted at any time prior to its expiration in the event a party believes circumstances so warrant.

/s/ Daniel A. Taylor

Neal C. Belgam (#2721)
Daniel A. Taylor (#6934)
SMITH, KATZENSTEIN & JENKINS LLP
1000 West Street, Suite 1501
Wilmington, DE 19801
(302) 652-8400
nbelgam@skjlaw.com
dtaylor@rlf.com

*Attorneys for Plaintiff Digital Media
Technology Holdings, LLC*

Dated: October 7, 2024

/s/ Jason J. Rawnsley

Robert W. Whetzel (#2288)
Jason J. Rawnsley (#5379)
RICHARDS, LAYTON & FINGER, P.A.
920 North King Street
Wilmington, DE 19801
(302) 651-7700
whetzel@rlf.com
rawnsley@rlf.com

*Attorneys for Defendant Disney Media &
Entertainment Distribution LLC*

SO ORDERED this _____ day of _____, 2024

THE HONORABLE CHRISTOPHER J. BURKE
MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE